

Gordon W. Renneisen (SBN 129794)
CORNERSTONE LAW GROUP
575 Market Street, Suite 3050
San Francisco, CA 94105
(t) (415) 625-5025
(f) (415) 974-6433
grenneisen@cornerlaw.com

Attorneys for Plaintiffs
THE CRONE LAW GROUP and
MARK E. CRONE

Michelle L. Visser (SBN 277509)
michelle.visser@ropesgray.com
ROPES & GRAY LLP
Three Embarcadero Center
San Francisco, California 94111-4006
Tel: (415) 315 6300
Fax: (415) 315 6350
(additional counsel listed on signature page)

Attorneys for Defendant
LIBERTY SURPLUS INSURANCE CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE CRONE LAW GROUP and MARK E.
CRONE

Plaintiffs,

vs.

LIBERTY SURPLUS INSURANCE
CORPORATION

Defendants.

Case No. 3:13-cv-05395-EDL

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING FEBRUARY 18,
2014 CASE MANAGEMENT
CONFERENCE AS MODIFIED

Hon. Elizabeth D. Laporte

Case Management Conference:
February 18, 2014 at 10:00 a.m.

1 Plaintiffs, Mark E. Crone (“Mark Crone”) and The Crone Law Group (“Crone Law”),
2 and Defendant Liberty Surplus Insurance Corporation (“Liberty” or “LSIC”) hereby enter into
3 the stipulation set forth below.

4 WHEREAS:

5 1. The initial Case Management Conference in this matter currently is set for
6 February 18, 2014

7 2. The parties believe that it would be productive to explore the possibility of
8 settlement before commencing discovery, engaging in motion practice, or otherwise actively
9 litigating the case.

10 3. The parties are committed to pursuing Alternative Dispute Resolution, would like
11 to complete ADR prior to the initial Case Management Conference, and will make a good faith
12 effort to resolve this matter through ADR before either the parties or the Court need to prepare a
13 case management plan.

14 4. On February 10, 2014 the parties had a conference call with ADR Program
15 Director Howard Herman. Although this call did not result in any ADR being scheduled, the
16 parties discussed several possible ADR options with Mr. Herman.

17 5. Mr. Herman has scheduled a second ADR conference call with the parties for
18 February 14, 2014. The parties anticipate that during the February 14 conference, or shortly
19 thereafter, the parties and Mr. Herman will agree on a form of ADR appropriate for this case and
20 will at least begin the process of scheduling ADR.

21 6. Rather than going forward with a Case Management Conference on February 18,
22 2014, the parties believe that it would better serve the interests of judicial economy to continue
23 the Conference for 30 days; to have the parties report to the Court in advance of the continued
24 Conference regarding their progress in scheduling ADR; and, if appropriate, to further continue
25 the Conference for enough time to enable the parties to complete ADR before the Conference.

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1 THEREFORE, THE PARTIES HEREBY STIPULATE, AND JOINTLY REQUEST THE
2 COURT TO ORDER THAT:

3 1. The Case Management Conference presently set for February 18, 2014 will be
4 continued to March ~~18~~²⁵, 2014.
18

5 2. By March ~~18~~¹⁸, 2014 the parties will submit to the Court a stipulation reporting on
6 the scheduling of ADR and proposing a date for the further continuance of the Case Management
7 Conference.

8 Dated: February 11, 2014

CORNERSTONE LAW GROUP

9
10 By Gordon W. Renneisen /s/
11 Gordon W. Renneisen
12 Attorneys for Plaintiffs
13 THE CRONE LAW GROUP and
MARK E. CRONE

14 Dated: February 11, 2014

ROPES & GRAY LLP

15
16 By Matthew M. Burke /s/
17 Michelle L. Visser (SBN 277509)
18 Kevin P. Daly (pro hac vice pending)
19 Matthew M. Burke (admitted pro hac vice)
20 matthew.burke@ropesgray.com
21 ROPES & GRAY LLP
22 Prudential Tower
800 Boylston Street
Boston, Massachusetts 02199-3600
Tel: (617) 951-7000
Fax: (617) 951-7050

23 Attorneys for Defendant
24 LIBERTY SURPLUS
25 INSURANCE CORPORATION

26 IT IS SO ORDERED.

27 Dated: February 14, 2014


HONORABLE ELIZABETH D. LAPORTE